

# Exhibit 4

Declaration of Thomas Bird

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

REPUBLICAN NATIONAL COMMITTEE,  
NEVADA REPUBLICAN PARTY, and  
SCOTT JOHNSTON,

Plaintiffs,

v.

FRANCISCO AGUILAR, in his official  
capacity as Nevada Secretary of State;  
LORENA PORTILLO, in her official capacity  
as the Registrar of Voters for Clark County;  
WILLIAM "SCOTT" HOEN, AMY  
BURGANS, STACI LINDBERG, and JIM  
HINDLE, in their official capacities as County  
Clerks,

Defendants.

Case No. 2:24-cv-00518-CDS-MDC

**DECLARATION OF THOMAS BIRD**

I, THOMAS BIRD, under penalty of perjury, hereby declare as follows:

1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein. If called upon to testify before this Court, I would do so to the same effect.

2. I am a resident of Lyon County, Nevada.

3. I am currently the President of the Nevada Alliance for Retired Americans ("The Alliance"), a non-partisan 501(c)(4) membership organization with roughly 20,000 members across the state of Nevada and over 4.4 million members across the country. Our members are geographically diverse, spanning from Elko to Las Vegas and from Reno to Ely. They are also diverse in terms of age and profession. We serve both older retirees who are farther into their retirement and new retirees, who have only recently stopped working. Similarly, our retirees come from many different AFL-CIO affiliated unions, and worked in many different industries before their retirement.

4. The Alliance's mission is to ensure the social and economic justice and full civil rights that retirees have earned after a lifetime of work, with a particular emphasis on protecting

1 the right to vote. To further that mission, each election cycle, we travel across the state to bring a  
2 voter education campaign directly to our members. As part of our voter education work, we put  
3 together voter education materials, help our members confirm their voter registration status and  
4 track the status of their submitted mail ballots, and answer any other questions they may have  
5 about how to get their ballots cast and counted.

6 5. Because our members are retired, it is not uncommon for them to relocate to  
7 assisted living facilities, to be closer to or to move in with family, or to transition into smaller  
8 homes for financial reasons. Many of them also frequently travel out of state to visit family or for  
9 personal travel. They are thus at particular risk of missing notifications by mail regarding their  
10 voter registration status.

11 6. Retirees are particularly likely to not receive mailed notices related to their voter  
12 registration status for the reasons outlined above. As a result, any purge of Nevada's voter rolls  
13 would undoubtedly and disproportionately impact the Alliance's members.

14 7. If a purge were to occur, ensuring that our members are registered and that any  
15 previously registered, eligible members get re-registered to vote would quickly become the  
16 Alliance's top priority. We would immediately host a series of in-person town halls across the state  
17 and—using the tools available to us on social media, via email and traditional mail, and through  
18 phonebanking—attempt to reach any potentially impacted members. We would also need to  
19 update—and likely create new—voter education materials in response to the purge.

20 8. In our conversations with members, and through our materials, we would direct all  
21 members to confirm their registration status and explain how to do so as well as outline the steps  
22 they would need to take to get re-registered were they to discover they were purged.

23 9. Because Nevada is a large state, because many of our members do not own  
24 computers or cell phones, and because, for the reasons articulated above, our members often  
25 change mailing addresses and do not have regular access to their mail, focusing on an in-person  
26 voter education campaign would be of particular importance to reach our members. Currently, our  
27 practice is to visit each of our 20 affiliated union and community groups across Nevada twice a  
28 year. In the event of a purge, we would have to double down on that to ensure we could make

1 contact with each group, in person, prior to the upcoming election. Our members are also a very  
2 engaged group and are likely to have a lot of questions that would require time and resources to  
3 address.

4 10. We are also a small team—the day-to-day activities of the Alliance are conducted  
5 entirely by me and my wife and a small board of seniors—so time and resources are already quite  
6 limited. Given our limited resources and the particular needs of our membership, responding to a  
7 purge would almost certainly come at the expense of other mission-critical priorities, such as  
8 advocating to lower the cost of prescription drugs, preserving social security and Medicare, and  
9 non-purge related voter education work. Our ability to establish relationships with new members  
10 and to focus on critical state legislative work which allows us to keep our members informed about  
11 their elected officials' voting records would also be severely compromised, significantly  
12 frustrating our mission.

13 I declare under penalty of perjury that the foregoing is true and correct.

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Executed on: 3-21-24

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